

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	No. 07 CR 783-1
v.)	
)	Judge Matthew Kennelly
JAIME BARRAZA CRUZ,)	
)	
Defendants.)	

**DEFENDANT JAMIE BARRAZA CRUZ'S MOTION TO CONTINUE THE
SENTENCING DATE**

Defendant, Jamie Barraza Cruz, moves this Court for an order continuing the date of his sentencing. In support, defendant states as follows:

1. On December 19, 2007, the defendant plead guilty to one count of illegal reentry, pursuant to 8 U.S.C. §1326(a) and (b)(2) and 6 U.S.C. §202(4). He is currently set to be sentenced on April 2, 2008.

2. Counsel for the defendant recently was on trial in the matter of *U.S. v. Tyree Terrell*, 06 CR 881 before Judge Ronald Guzman which finished March 11, 2008 and counsel was out of town from March 20 through March 31. Counsel has therefore been unable to meet with the defendant until recently and counsel wishes to file a Sentencing Memorandum on the defendant's behalf.

3. The Assistant United States Attorney, Jackie Stern, has no objection to the defendant's motion.

4. This motion is made with good cause and is not made to delay the case other than for the reasons set forth in this motion.

WHEREFORE, Defendant, Jamie Barraza Cruz, respectfully requests that this Honorable Court vacate the sentencing date of April 2, 2008 and set a new date.

Respectfully submitted,

By: s/Thomas More Leinenweber
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